

MICHAEL DAVID SILLS
and MARY SILLS,

Plaintiffs,

V.

SOUTHERN BAPTIST CONVENTION,
et al.

Defendants.

CASE NO. 3:23-cv-00478

JUDGE WILLIAM L. CAMPBELL, JR.
Magistrate Judge Chip Frensley

JURY TRIAL DEMANDED

**PLAINTIFFS AND DEFENDANT JENNIFER LYELL’S JOINT AND UNOPPOSED
MOTION FOR A DISCOVERY CONFERENCE AND FOR MODIFICATION TO THE
BRIEFING SCHEDULE**

Pursuant to Section G of the Stipulated Amended Case Management Order (ECF No. 170) and Local Rule 37.01, Plaintiffs, David and Mary Sills, and Defendant, Jennifer Lyell, respectfully request a telephonic discovery conference with Magistrate Judge Frensley to address the parties' concerns regarding the witness identified in Plaintiffs' Emergency Motion for Protective Order (ECF No. 200) and responses to various subpoenas issued to medical providers. The parties met and conferred in person in a good-faith attempt to resolve their discovery dispute on February 11, 2025, and made progress in reaching a resolution. Nevertheless, some particular concerns remain for which the Parties jointly seek guidance from the Court. Counsel for the remaining defendants have advised that they do not oppose a discovery conference on this issue.

Relatedly, Plaintiffs and Defendant Jennifer Lyell hereby jointly move this Court for an extension of the parties' briefing deadlines set by this Court's February 3, 2025, Order (ECF No. 204). Plaintiffs and Defendant Lyell request that the Court extend Defendants' response deadline

from February 13, 2025, until seven days after the discovery conference, or, if the request for a discovery conference is denied, seven days after the entry of the Court's order ruling on this motion, and extend the Plaintiffs' optional reply deadline from February 20, 2025, until seven days from the date of Defendants' response. Plaintiffs and Defendant Lyell would show good cause for such an extension as follows:

1. The Court granted the Plaintiffs' emergency motion and quashed the deposition that was set for February 4, 2025. (Order, at 2, ECF No. 204.)

2. Under the Amended Case Management Order, discovery disputes are to be brought before the Court by request for a discovery conference after the parties have conferred in-person to resolve the discovery dispute. (Stipulated Am. Case Mgmt. Order at ¶ G, ECF No. 170.)

3. Counsel for Plaintiffs and Defendant Lyell have conferred in person and agree that the parties would benefit from a discovery conference concerning Plaintiffs' Motion for a Protective Order (ECF No. 200), specifically regarding whether the briefing on the motion may be filed under seal.

4. Plaintiffs and Defendant Lyell also anticipate filing a joint motion to seal the briefing on Plaintiffs' motion for protective order and intend to make a showing of good cause at the discovery conference.

5. The remaining defendants have advised that they do not oppose this motion.

For these reasons, Plaintiffs and Defendant Lyell request that the Court convene a discovery conference and further request that the Court extend Defendants' response deadline from February 13, 2025, until seven days after the Discovery Conference, or, if the request for a discovery conference is denied, seven days after entry of the Court's order ruling on this motion,

and extend the Plaintiffs' optional reply deadline from February 20, 2025, until seven days from the date of Defendants' response.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this the 12th day of February, 2025, the foregoing was served via the court's electronic filing system on the following counsel of record:

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